

EXHIBIT F

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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THE UNITED STATES OF)
AMERICA ex rel. JULIE)
LONG,)
)
Plaintiffs,) Civil Action No.
)
vs.) 16-12182-FDS
)
JANSSEN BIOTECH, INC.,)
)
Defendant.)
-----X

REMOTE VIDEOTAPED DEPOSITION OF THAO MARZULLO
Tuesday, November 28, 2023; 10:31 a.m. EDT

Reported by: Cindy L. Sebo, RMR, CRR, RPR, CSR,
CCR, CCR, CLR, RSA, NYRCR, NYACR, CA CSR 14409, NJ
CCR 30XI00244600, NJ CRT 30XR00019500, Washington
State CSR 23005926, Oregon CSR 230105, TN CSR 998,
NM CSR 589, Remote Counsel Reporter, LiveLitigation
Authorized Reporter, Notary Public
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1 Xillix, or was there someone else who -- from
2 Xillix that you dealt with?

3 A. There was also Jim -- I can't recall
4 his last name, but he was a -- a member of Xillix.

5 Q. Jim Foreman?

6 A. Yes. Thank you.

7 Q. Okay. And -- and so was --
8 Robert Alder and Jim Foreman were both heavily
9 involved in sort of creating strategy for site of
10 care marketing?

11 MR. RAOFIELD: Objection to form.

12 THE WITNESS: I think it's how you
13 define "heavily involved."

14 BY MR. PRESTON:

15 Q. Well, I'm -- I'm asking you what --
16 what their level of involvement was. I'm not --
17 I'm not concerned about whether they helped make a
18 pretty slide deck. It's more about the substance
19 and content of the slide deck that I'm asking
20 about.

21 MR. RAOFIELD: Objection to form.

22 THE WITNESS: So most marketing
23 teams usually have what's called an "agency
24 of record." And they, for the most part,
25 are the most consistent agency/vendor that

1 you work with to provide you strategic
2 support and tactical support, like
3 beautification of slide decks.

4 So if that's your definition of
5 "heavily involved," then that would be
6 Xillix, for the most part, within site of
7 care marketing.

8 BY MR. PRESTON:

9 Q. I guess I'm -- I'm confused,
10 Ms. Marzullo.

11 I want -- I want -- forgot about --
12 I'm not interested if they -- what they did with
13 the slide deck. I want to know what their
14 involvement was with the contents, with the actual
15 strategies and objectives that are set forth in
16 the slide deck.

17 A. So, again, as my agency of record,
18 right, and providing strategic, like, consultation
19 and tactical support, most likely, I would have
20 gone to them and shared these versions, just like
21 kind of how this e-mail seems to show that Bob had
22 a version of the deck. So most likely, I would
23 have shared with them: These are the themes of
24 the strategic imperatives; these are the words;
25 are there better words; is there an unintended